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3221 North George Mason Drive, Arlington, Virginia 22207, USA

November 1, 2000

Magalie Roman Salas
Secretary, FCC
455 12th St., SW
Washington, DC 20554
Re: Ultra-Wideband (ET Docket 98-153)

Dear Ms. Salas:

On behalf of the Center for Public Service Communications, I write in response to the FCC's Notice of Proposed Rulemaking on ultra-wideband (UWB) radio. CPSC is a U.S.-based consulting company that was established in 1990 to support public and private sector health and humanitarian organizations apply new communications and information technologies to their programs.

For more than ten years CPSC has sought to make public service clients aware of opportunities for using new and emerging telecommunications and information technologies to improve the delivery of their many and various public services. One such technology application that offers considerable potential is UWB. CPSC believes UWB offers the promise of reducing cost and improving the quality of and access to public service programs. A compelling example of the potential of UWB is in the area of medical response to natural disasters and similar emergencies. At a disaster site, frequently cut off from communications access because of the vulnerability of the local terrestrial network, UWB technologies could support disaster response coordination by permitting transmission of large quantities of data using extremely low-power. Such a capability would also increase the communications services options available to the public while placing minimal additional demands on spectrum bandwidth.

Other possible applications include such public health activities as communicating health information between health professionals and consumers, and clinical applications like transmitting home health monitoring data to health professionals for health evaluation and management.

CPSC is aware of the concerns that have been expressed regarding some applications of UWB technologies that may interfere with certain public safety signals, such as those used for GPS by aircraft. We urge the FCC to exercise care and diligence in dealing with these applications. However, to the extent that the FCC has tentatively concluded that some UWB applications which operate above 2 GHz – including UWB local networking technologies – do not threaten to interfere with existing wireless technologies, CPSC urges the Commission to move forward to approve the unlicensed use of the spectrum above 2 GHz for ultra-wideband products to help bring benefits of telehealth and other public service applications to all Americans.

Yours respectfully,



John Scott
President

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